

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

BRIAN HAUGER, individually
and on behalf of all others similarly situated,
Plaintiffs,

Case No: 1:25-cv-01058-VMC

v.

SDWC FINANCIAL, LLC, a Florida
limited liability corporation,
and MEREDITH BRUCE,
a Georgia individual,
Defendants

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS (ECF NO. 18) AND FOR ALL OTHER JUST
AND PROPER RELIEF**

Plaintiff Brian Hauger (“Plaintiff”), through undersigned counsel, respectfully requests an extension of time—through and including May 5, 2025—to file his response to Defendants’ Motion to Dismiss (ECF No. 18). In support of this request, Plaintiff states as follows:

1. On February 28, 2025 Plaintiff filed his Class Action Complaint alleging, inter alia, violations of federal and Georgia securities laws arising from Defendants’ sale of unregistered Drive Planning promissory-note investments. (ECF No. 1).
2. On May 5, 2025, Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6). (ECF No. 18). No answer has yet been filed, and no scheduling order has been entered.
3. Under N.D. Ga. L.R. 7.1(B), Plaintiff’s response is presently due May 19, 2025.

4. Undersigned counsel has depositions in an unrelated matter and a mediation in an unrelated matter. These prior commitments render the existing response date impracticable. A brief, two-week extension will permit counsel to prepare a fulsome brief that will assist the Court.

5. On May 8, 2025, Plaintiff's counsel conferred via e-mail with Defendants' counsel regarding the relief sought herein. Defendants do not oppose the requested extension.

6. This is Plaintiff's first request for an extension of any deadline in this case. Granting the requested relief will not prejudice any party and will not affect any other deadlines, as none have been set.

7. Good cause therefore exists under Fed. R. Civ. P. 6(b)(1)(A) to extend the response deadline to June 2, 2025.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion and enter the proposed Order, filed contemporaneously herewith as Exhibit A, extending Plaintiff's deadline to respond to Defendants' Motion to Dismiss through and including June 2, 2025, and granting such further relief as the Court deems just and proper.

Respectfully Submitted,

/s/Ross M. Good
Ross M. Good, Esq.
The Good Law Group
800 E. Northwest Hwy, Ste 814
Palatine, IL 60074
Ph: (847) 577-4476
Fax: (800) 709-1179
(IL Bar No. 6312917;
FL Bar No. 0116405)
Ross@thegoodlawgroup.com

Brian B. Pastor, Esq.
Sonn Law Group
PA 3455 Peachtree Rd NE, Ste. 500
Atlanta, GA 30326
Tel: 305-912-3000 Ext. 538
Fax: 404-738-1505
GA Bar No. 565860
E-Mail: BPastor@SonnLaw.com

Shawn M. Good, Esq.
The Good Law Group
800 E. Northwest Hwy, Ste 814
Palatine, IL 60074
Ph: (847) 577-4476
Fax: (800) 709-1179
(IL Bar No. 632932)
Shawn@thegoodlawgroup.com

Jeffrey Sonn, Esq.
Sonn Law Group PA
19495 Biscayne Blvd, Suite 607
Aventura, FL 33180
Tel 305-912-3000
Fax 786-485-1501
FL Bar No. 773514
Jsonn@Sonnlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2025, I electronically filed the foregoing Plaintiff's Motion for Extension of Time using the Court's CM/ECF system, which will automatically send notice to all counsel of record.

/s/ Ross Good

Ross Good